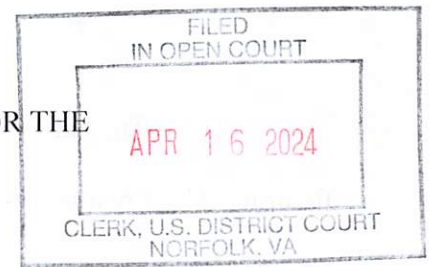


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



UNITED STATES OF AMERICA

v.

RASWELL JAHKEE STEVERSON,
a/k/a RASWELL J. STEVENSON

Defendant.

Case No. 2:22-cr-109

STATEMENT OF FACTS

The United States and the defendant, RASWELL JAHKEE STEVERSON, a/k/a RASWELL J. STEVENSON ("the defendant"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On or about April 14, 2021, in the Eastern District of Virginia, the defendant did knowingly possess a firearm while knowing he had previously been convicted of a felony.
2. Prior to April 14, 2021, the defendant was wanted for a shooting that occurred at the oceanfront in Virginia Beach. Investigators with the Virginia Beach Police Department Fugitive Squad learned that the defendant worked at MacArthur Mall in Norfolk, VA.
3. On April 14, 2021, the investigators, along with police officers with the Norfolk Police Department, approached the defendant while he was working at a mall kiosk. The investigators were able to detain the defendant without incident.
4. Strapped to the defendant's chest was a messenger bag. During the arrest, one of the investigators asked if the defendant had any weapons. The defendant said yes and indicated that the weapon was in the bag. The investigator removed the bag from the defendant's person.

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5. The bag was searched, and it contained a loaded Glock, Model 23, semiautomatic firearm. The firearm was loaded with a high-capacity magazine that could hold 30 rounds of ammunition.

6. The Glock was manufactured by Glock GmbH in the Country of Austria and imported into the United States through the State of Georgia; therefore, it was transported in interstate or foreign commerce.

7. On March 26, 2021, just a few weeks prior to this date of offense, the defendant was at the Virginia Beach oceanfront with several other individuals. Multiple cameras recorded the events of that night. One of the defendant's associates started a physical fight with another individual. During that fight a shot was fired. Then several shots rang out. The defendant is observed firing a shot at the individuals as they ran away.

8. Casings recovered from the shootings that night confirm that the Glock the defendant possessed on April 14, 2021, was one of the firearms involved in the shooting on March 26, 2021, at the Virginia Beach oceanfront.

9. On April 14, 2021, after he was arrested, he made a recorded phone call from the Virginia Beach City Jail. During that call he discussed the differences that would be present on rounds fired from a Glock 23 versus a Glock 40. He goes on to say that he isn't worried about the charges in Virginia Beach. But said the only thing he is looking at is the charges from MacArthur because he was caught red-handed with the gun on his chest.

10. On April 14, 2021, the defendant knew he was a convicted felon and knew his right to possess a firearm had not been restored. In 2018 the defendant was convicted of two counts of Grand Larceny, one count of Burglary, one count of Possession of Burglary Tools, and one count

of Destruction of Property. All those offenses are felonies which carry a potential sentence of more than one year.

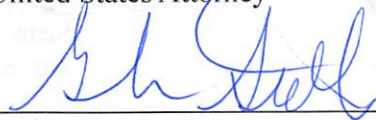
11. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all the facts surrounding the defendant's case.

12. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Jessica D. Aber
United States Attorney

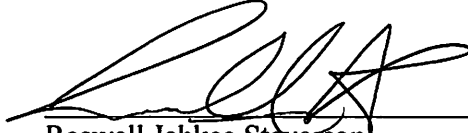
By:



Graham M. Stolle
Special Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered this day between the defendant, RASWELL JAHKEE STEVERSON, a/k/a RASWELL J. STEVENSON, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

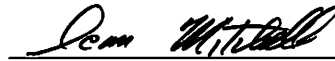
April 15, 2024
Date



Raswell Jahkee Steverson,
a/k/a Raswell J. Stevenson

I am the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

April 15, 2024
Date



Sean Mitchell, Esq.
Attorney for the defendant

RJS
SCM
CSC